

## DR. LEROY A. GARRETT

MEMBER PETROAMIGOS DE VENEZUELA ONG

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July 3, 2025

The Honorable Leonard P. Stark  
United States District Court  
District of Delaware  
J. Caleb Boggs Federal Building  
844 N. King Road  
Wilmington Delaware 19801

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DISTRICT OF DELAWARE  
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**Re: Crystallex International Corp. v. Bolivarian Republic of Venezuela, Case No. 17-mc-00151-LPS**

Dear Judge Stark,

With a heavy heart and an urgent plea, I write on behalf of 23,000 of the Venezuelan Petroleum Holocaust, pro se, to implore you to see beyond the cold efficiency of a sale process and embrace the profound human tragedy of these victims. The recent developments—the New York ruling (D.I. 241), OFAC extension (D.I. 1816), our petition to subpoena for “gente del petróleo” (Horacio Medina, Samuel Wilhelm, Carlos Jorda), and Vitol’s bid—demand not just legal consideration, but moral urgency.

**1. The Venezuelan Petroleum Holocaust:** This is not merely a financial dispute; it is a human rights catastrophe. The 23,000 workers I represent are not just creditors; they are victims of a systematic dismantling of their livelihoods, their dignity, and their future. The strikes led by “gente del petróleo,” the asset confiscations, the dismissals—these are not abstract legal issues. They are the flesh and blood of a holocaust that has left families destitute, communities shattered, and a nation scarred. Judge Stark, I beg you to feel the weight of this tragedy, to see the faces behind the numbers, and to understand that efficiency cannot erase their suffering.

**2. New York Ruling (D.I. 241):** This ruling confirms PDVSA’s liability, a beacon of hope in our dark struggle. It is not just a legal victory; it is a validation of our humanity. It screams that the 23,000 workers are not invisible, that their rights under the FSIA (28 U.S.C. § 1605(a)(3)) are not negotiable. Please, do not let this light be dimmed by the shadow of an efficient sale.

**3. OFAC Extension (D.I. 1816):** This extension is not just a delay; it is a lifeline. It buys us time to breathe, to hope, to fight for justice. It tells us that the world recognizes the complexity of our

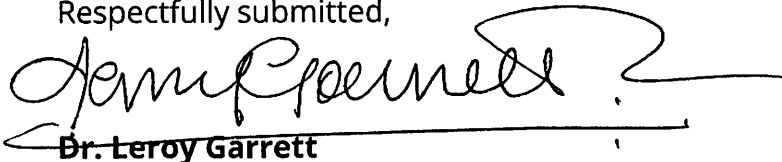
plight, that the rush to sell PDV Holding cannot silence our cry. Use this time, Judge Stark, to consider the substantive heart of our claim, not just the procedural heartbeat of efficiency.

4. **Subpoena for “Gente del Petróleo”:** Horacio Medina, Samuel Wilhelm, and Carlos Jorda are called to testify, and their voices, even if opposed, cannot ignore the holocaust they helped orchestrate. Their deposition is a chance to confront the past, to demand accountability, and to ensure that the 23,000 workers’ story is heard. Please, do not let their corporate positions and opposition drown out the truth of our suffering.

5. **Vitol Bid:** A bid exceeding \$10 billion is a stark reminder of the stakes. But Judge Stark, this sale cannot be the end. It cannot erase the 23,000 workers’ rights as creditors, as confirmed by *Simon v. Republic of Hungary*, 812 F.3d 127, 140. We do not seek to interrupt the goal of an efficient sale process; we seek to protect our creditors’ rights within it. The efficiency you prize must not come at the cost of justice, of humanity, of the very soul of this case.

Judge Stark, I appeal to your conscience as much as to your gavel. The “efficient” sale process risks turning the 23,000 workers into collateral damage, a footnote in a financial ledger. But they are not numbers; they are people, fathers, mothers, sons, daughters, whose lives have been ravaged by a holocaust that demands your attention. Please, consider our motions (D.I. 1771, 1812, 1817) and the substantive evidence before the August 18, 2025, hearing. Protect our creditors’ rights, not by interrupting efficiency, but by ensuring it serves justice. The 23,000 workers’ future hangs in the balance, and I implore you, with all the feeling of their collective pain, to act.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leroy Garrett", with a long horizontal line extending to the right.

**Dr. Leroy Garrett**

U.S. Citizen, Former PDVSA Employee  
Member, PetroAmigos de Venezuela